

1 **Remarks for the “Response to Final Office Action Dated**
2 **6/6/2006 UNDER 37 C.F.R. § 1.116”**

3 Applicant respectfully requests entry of the following remarks and
4 reconsideration of the subject application. Applicant respectfully requests entry of
5 the amendments herein. The remarks and amendments should be entered under 37
6 C.F.R. §1.116 as they place the application in better form for appeal, or for
7 resolution on the merits.

8 Applicant respectfully requests reconsideration and allowance of all of the
9 claims of the application. Claims 1-7, 15-19, 64, 65, and 67-71 are presently
10 pending. Claims amended herein are 1,-4, 15-17, 64, 65, 67, 69, and 71. Claims
11 withdrawn or cancelled herein are none. New claims added herein are none.

12
13 **Formal Request for an Interview**

14 If the Office’s response to this communication is anything other than
15 allowance of all pending claims, then Applicant formally requests an interview
16 with the Examiner of the present patent application. Applicant asks the Examiner
17 to call and/or email the undersigned attorney for the Applicant to schedule a
18 convenient date and time for a telephone interview.

19 The undersigned attorney is on the west coast, therefore can typically be
20 found in his office from about 12pm until 7pm (Eastern Time) from Monday
21 through Friday. Rather than leave a voice mail, please select the option to be
22 forwarded to my cell phone.
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Telephone Conference

Applicant appreciates the Examiner's willingness to talk to the undersigned attorney for the Applicant, Kasey Christie. While Applicant does not agree with the rejections of the claims, Applicant amends the claims herein in order to find mutually agreeable allowable subject-matter for the claims.

Applicant reserves the right to reintroduce the subject-matter of the claims—as they were before the amendments herein—in a future sibling or child application.

Substantive Claim Rejections

Claim Rejections under §103

The Office rejects all of the pending claims under §103. For the reasons set forth below, the Office has not shown that the cited references disclose, teach or suggest (under §103) the rejected claims. Accordingly, Applicant respectfully requests that the rejections be withdrawn and the case be passed along to issuance.

The Office's rejections are based upon **Hull**: *Hull et al.*, U.S. Patent No. 5,465,353 (issued 11/7/1995).

Overview of the Application

The Application describes a technology for recognizing the content of text documents. The technology may detect similarity between text-based works in an automatic and accurate manner. Furthermore, it may categorize content of text-based works in an automatic and accurate manner.

1 Generally, the technology determines one or more hash values for the
2 content of a text document. Furthermore, the technology may generate a "sifted
3 text" version of a document.

4 In one implementation described herein, document recognition is used to
5 determine whether the content of one document is copied (i.e., plagiarized) from
6 another document. This is done by comparing hash values of documents (or
7 alternatively their sifted text).

8
9 **Hull**

10 The Office cites **Hull** as its primary reference in its obviousness-based
11 rejections.

12 **Hull** discloses a document matching and retrieval system where an input
13 document is matched against a database of documents, using a descriptor database
14 which lists descriptors and points to a list of documents containing features from
15 which the descriptor is derived document. The descriptors are selected to be
16 invariant to distortions caused by digitizing the documents or differences between
17 the input document and its match in the document database. An array of
18 accumulators is used to accumulate votes for each document in the document
19 database as the descriptor base is scanned, wherein a vote is added to an
20 accumulator for a document if the document is on the list as having a descriptor
21 which is also found in the input document. The document which accumulates the
22 most votes is returned as the matching document, or the documents with more than
23 a threshold number of votes are returned
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Obviousness Rejections Based upon Hull

The Office rejects all pending claims (claims 1-7, 15-19, 64-65 and 67-71) under USC § 103(a) as being unpatentable over **Hull**. Applicant respectfully traverses the rejections of these claims.

In light of the claim amendments made herein, Applicant submits that all of the outstanding substantive claim rejections are moot.

In particular, no cited reference discloses, "filtering the textual content the body of text to remove elements of the textual content." Via the amendments herein, this text (or similarly worded text) was added to all independent claims herein.

Consequently, **Hull** does not disclose all of the claimed elements and features of these claims. Accordingly, Applicant asks the Office to withdraw its rejection of these claims.

1 **Dependent Claims**

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3 In addition to its own merits, each dependent claim is allowable for the
4 same reasons that its base claim is allowable. Applicant submits that the Office
5 withdraw the rejection of each dependent claim where its base claim is allowable.
6

7 **Conclusion**

8 All pending claims are in condition for allowance. Applicant respectfully
9 requests reconsideration and prompt issuance of the application. If any issues
10 remain that prevent issuance of this application, the Office is urged to contact the
11 undersigned attorney before issuing a subsequent Action.
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15 Dated: 7-21-06

Respectfully Submitted,

By: 

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